

REMARKS

Claims 1-22 are all the claims pending in the present application. Claim 2 is amended herein. Reconsideration of the subject patent application and allowance of all the claims is respectfully requested in view of the foregoing amendments and the following remarks.

Claim 2 has been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. In particular, the Patent Office asserts that the phrase “selected from the following group” is indefinite, as it is not clear whether the identifiers are limited to only one group, some of the groups, or all of the groups. Applicants have amended claim 2 to clearly define the invention. In view thereof, withdrawal of the rejection under 35 U.S.C. § 112, second paragraph, is respectfully requested.

Claims 1-22 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Perkowski (U.S. Patent No. 5,950,173). This rejection, as it may apply to the claims as amended, is respectfully traversed.

Applicable case law holds that in order to anticipate a claim, a single prior art reference must teach or suggest each and every limitation of the claim. In the present case, Perkowski does not teach all the limitations of the claims.

Perkowski relates to a system and method for delivering consumer product-related information to consumers within retail environments using Internet-based information servers. The information servers store information pertaining to UPC (uniform product code) symbols preassigned to consumer products registered with the system, and a list of URLs that are hyperlinked to the UPC symbols on the consumer products. When the UPC symbol is read or scanned, a menu of the URLs associated with the UPC symbol is automatically displayed. The

displayed menus are categorically arranged according to specific types of product information such as product specifications and operation manuals, product wholesalers and retailers, product advertisements and promotions, product endorsements, product updates and reviews, or the like.

Q Among other things, Perkowski fails to teach or suggest “a database that stores a plurality of identifiers for each product, relationships between the identifiers, and for each identified product, a plurality of product attributes (emphasis added),” as recited in independent claim 1.

Independent claim 10 has similar limitations. The Patent Office analogizes the “plurality of identifiers for each product” stored in the database (of claim 1) with the column headings (e.g., registrant’s name, product description, etc. in Fig. 4A1) of Perkowski. However, the products of Perkowski are only identified by a single identifier that is stored in a database. The single identifier is a UPC data structure, such as a UPC symbol that is scanned or read by an optical scanner. Column 19, line 55-column 20, line 5, and column 33, lines 61-63. Correspondingly, there is no relationship between identifiers in Perkowski, as Perkowski does not disclose a

D plurality of identifiers. Further, the information relating to the product in Perkowski, such as a trade/service mark, the company that registered the product, etc. is not analogous to the “plurality of product attributes” stored in the database of claim 1.

Perkowski’s system is adverse to the teachings of claim 1. In Perkowski, a product that is offered for sale by a company is identified only by its UPC, and information regarding that product (e.g., list of URLs) is stored in the system. Conversely, in the present invention, as set forth in claim 1, a product is identified by a plurality of identifiers (e.g., a manufacturer’s model number or other identifier used by the manufacturer, a distributor’s part number or other identifier used by a distributor of said product, one of more vendor’s SKUs or other identifier

used by the one or more vendors, serial number). A relationship between the identifiers, for example, how a product with a manufacturer's model number is related to a product with a distributor's part number, is stored in the database along with the plurality of identifiers. For each identified product, a plurality of attributes (*e.g.*, name of product, etc.) and information (*e.g.*, company selling product, price of product, features of products, reviews, etc.) are stored.

3 Further, Perkowski does not disclose "a data collector for retrieving product information from at least one external source and automatically associating said retrieved product information with the prestored information on the database and normalizing said retrieved product information product information in accordance with product information already stored in the database," as recited in independent claim 1. Independent claim 10 has similar limitations. In the Office Action, it is stated that proffered data collectors of Perkowski "are capable of collecting data for building the relational database," and "normalize[] the data by inserting the data into the predefined columns of the tables in FIGS. 4A1, 4A2 and 4B." The text at column 25, lines 1-64, as cited by the Patent Office, merely describes how a user can find a product on the system of Perkowski. As described at column 24, lines 59-67 of Perkowski, "the product finding functionalities of the system of the present invention depends in large part of the number of consumer-products registered with the IPI Finding and Serving Subsystem thereof," and "[f]ive such techniques will be detailed below." Locating or finding a product (as in Perkowski) is not analogous to collecting or retrieving product information, associating the retrieved product information with prestored information on a database, and normalizing the retrieved product information with product information already stored in the database as recited in claim 1.

With respect to independent claim 10, among other things and in addition to the above, Perkowski fails to teach or suggest the limitation “gathering product information from diverse external sources.” In Perkowski, product information is gathered for a particular product by reading a UPC symbol. Column 19, line 55-column 20, line 5. Information is not gathered from “diverse external sources,” as recited in claim 10. Correspondingly, Perkowski fails to teach or suggest “loading the gathered product information into the database,” “translating associated product attribute information in said gathered information into a canonical representation ...,” and “adding a product identifier and related product information to said database”

Since Perkowski does not teach each and every limitation of claims 1 and 10, Perkowski cannot anticipate these claims. Thus, the rejection of claims 1 and 10 should be withdrawn.

With respect to independent claim 12, among other things, Perkowski fails to disclose gathering information (at least two of types (1)-(11)) on a product or service. Figures 4A1, 4A2 and 4B do not show or illustrate the types of information recited in claim 12. Correspondingly, Perkowski does not teach or suggest “storing the gathered information ...,” and “outputting said information to said user in a format whereby said user has access to all of the gathered and stored information related to the product/service of interest.”

Since Perkowski does not teach each and every limitation of claim 12, Perkowski cannot anticipate this claim. Thus, the rejection of claim 12 should be withdrawn.

With respect to independent claim 22, among other things, Perkowski fails to teach or suggest “assigning a token integer to each character string ...,” “creating a look-up table of character strings, each being associated with its assigned token integer,” “creating a record search file from said records in said database ...,” “retrieving a parameter search query from a

user,” and “carrying out said search query by traversing said record search file.” In the Office Action, the Patent Office states that the column marked “IP/SN” are serial numbers or a unique product serial number (page 3, claim 2; and page 3, claim 4). Notwithstanding, the Patent Office states that “token integers (IP/SN) are associated with character strings (product descriptions)” and “[t]he row of the token integer indicates the row in which the characters of the product description can be found.” It is clear from the Office Action that Perkowski does not teach or suggest the limitations of claim 22, and the Patent Office has extracted non-related elements from Perkowski to derive the claimed invention.

Since Perkowski does not teach each and every limitation of claim 22, Perkowski cannot anticipate this claim. Thus, the rejection of claim 22 should be withdrawn.

Dependent claims 2-9, 11 and 13-21 depend from at least one of independent claims 1, 10 and 12, and are submitted to be patentable over the cited references for at least the same reasons set forth above in connection with claims 1, 10 and 12, as well as for the additional features they recite. For example, claim 2 recites “wherein the identifiers are selected from at least two of the following[:] a manufacturer’s model number or other identifier used by the manufacturer; a distributor’s part number or other identifier used by a distributor of said product; one of more vendor’s SKUs or other identifier used by the one or more vendors; and serial number.” Since Perkowski does not disclose a plurality of identifiers (and the only identifier disclosed in Perkowski is a UPC), Perkowski cannot teach this limitation.

Claim 3 recites “wherein the database further stores information about features of the product.” The product description (e.g., toothpaste, acid reducer, film processing, personal computer) as illustrated in Figure 4A1 and the product specification information field as

illustrated in Figure 4A2 of Perkowski is not information about features of a product. Indeed, Perkowski does not disclose the above limitation.

Claim 4 recites “wherein the database assigns a universal SKU to each product.” The Patent Office states that the IP/SN “appears” to be a universal SKU. However, in order to anticipate a claim, the prior art reference must disclose each and every limitation of the claim. In this case, Perkowski does not disclose a universal SKU to each product and the “IP/SN” is not a universal SKU.

Claim 5 recites in part “the relationships between the identifiers is stored as a tuple.” Since Perkowski fails to teach or suggest a plurality of identifiers and their relationships, Perkowski cannot teach this limitation.

Claim 14 recites “displaying a class list ... and receiving a user class input selecting one of the classes of products/services from the class list” Perkowski does not disclose this limitation.

Claim 15 recites “displaying a feature list ... and receiving a user feature input selecting one or more of the product/service features from the feature list” Perkowski does not disclose this limitation.

Claim 16 recites “displaying information on a product” such as “a picture of the product.” The Patent Office avers that a “product simulation” of Perkowski is a picture of a product. Applicant submits that Perkowski does not display pictures of a product. In fact, there is no disclosure of displaying pictures of a product. A product simulation can be a written description of how the product works, and not necessarily a picture of the product.

Claim 17 recites “allowing the user to add ... a user review of the product/service.” The Patent Office contends that the “update field” of Figure 4A2 of Perkowski is analogous to a user’s review. However, there is no disclosure in Perkowski of a user adding his comments regarding a product or service. Further, the update field of Figure 4A2 is analogous to a user review.

Claim 18 recites “allowing the user to add a rating of the product/service” In the Office Action, it is stated that the “product review information field” of Perkowski is a user’s rating. The product review information field is not necessarily a rating from a user. The product review can be a review from the manufacturer of the product. Perkowski does not disclose a rating from a user.

Claim 19 recites “one or more evaluations of the one or more user reviews.” Since Perkowski does not disclose user reviews, Perkowski cannot teach or suggest this limitation.

Claim 20 recites “suggesting one or more complementary products/services that may be purchased along with the product/service of interest.” The Patent Office asserts that the product advertisement field “suggests” a complementary product/service. This assertion is without merit. There is no disclosure of suggesting a complementary product/service in the Perkowski reference.

Claim 21 recites “assigning unique integer identifiers to each character string” Perkowski does not disclose the limitations of claim 21.

Applicants submit that the present application is now in condition for allowance.

Reconsideration and favorable action are earnestly requested.

Respectfully submitted,

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Attachment: Version with markings to show changes



Version with markings to show changes: Amended Claims:

2. (Amended) The system of claim 1 wherein the identifiers are selected from at least two of the following [group]:

- a manufacturer's model number or other identifier used by the manufacturer;
- a distributor's part number or other identifier used by a distributor of said product;
- one of more vendor's SKUs or other identifier used by the one or more vendors; and
- serial number.

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